

The Honorable Michelle L. Peterson

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

WILD FISH CONSERVANCY, a Washington
non-profit corporation,

Plaintiff,

v.

BARRY THOM, in his official capacity as
Regional Administrator of the National Marine
Fisheries Service; CHRIS OLIVER, in his
official capacity as the Assistant Administrator
for Fisheries of the National Marine Fisheries
Service; NATIONAL MARINE FISHERIES
SERVICE; WILBUR ROSS, JR., in his official
capacity as Secretary of the United States
Department of Commerce; and UNITED
STATES DEPARTMENT OF COMMERCE,

Defendants.

and

ALASKA TROLLERS ASSOCIATION,

Intervenor-Defendant.

No. 2:20-cv-0417-MLP

**DECLARATION OF DEBORAH LYONS
IN SUPPORT OF DEFENDANT-
INTERVENOR ALASKA TROLLERS
ASSOCIATION'S BRIEF IN
OPPOSITION TO PLAINTIFF'S MOTION
FOR PRELIMINARY INJUNCTION**

I, DEBORAH LYONS, hereby declare as follows on the basis of personal knowledge to
which I am competent to testify:

1. I am a member of the Alaska Trollers Association. I hold a State of Alaska Hand
Troll permit. I first moved to Alaska in 1976, hand trolled in the early 80's, and in 1986 began
working as a crewmember on the salmon power troller F/V Kraken, the first year after the
Pacific Salmon Treaty was signed.

1 2. My skipper, David Roy Lyons, began trolling in 1964. We married in 1988. We
2 fished together full time until 1999. My duties included navigation, handling gear, and landing,
3 dressing and icing the fish, preparing meals and maintaining the cleanliness of our vessel. I
4 became very familiar with southeastern Alaska outside and inside waters. We fished for
5 Chinook and Coho salmon from Noyes Island near Craig all the way north and west to Yakutat
6 beginning on July 1 and finishing mid-September. We often talked about the new program to
7 rebuild the mighty Chinook salmon. David had attended a meeting at Centennial Hall in Sitka in
8 1984 where the Alaska Department of Fish and Game was encouraging the trollers to sign on to
9 the new Treaty. "C'mon fellas, just tighten your belts and soon you will be catching 400,000
10 again", said ADFG Scott Marshall ... long ago retired from the Department.

11 3. Our home is in Sitka. With the exception of the 14 years that I was employed as
12 the Executive Director for Sitka Trail Works, all of our household income has been derived from
13 either commercial fishing or my work as an advocate for sustainable, well-managed fisheries.
14 We made our last salmon trolling trip in 2019 and are now retired from fishing.

15 4. Governor Cowper appointed me to serve a three-year term on the Alaska State
16 Board of Fisheries in 1990. The Alaska State Fisheries Board develops the regulations for
17 management of all freshwater and marine fisheries in state waters. In order for an Alaskan
18 fisheries regulation to be changed, a proposal must be submitted, published, reviewed at a public
19 meeting and finalized by action of the Fisheries Board. This experience increased my
20 knowledge of fisheries regulations, and common difficulties experienced in fisheries
21 management.

22 5. In 1995, the Alaska Trollers Association nominated me to serve as a fishing
23 industry representative on the Northern Panel of the Pacific Salmon Commission, and Governor
24 Hickel forwarded my name for appointment by the Secretary of Commerce, Ron Brown. I was
25 part of the group that negotiated the terms of the 1999 Pacific Salmon Treaty. The 1999 Treaty
26 provided "abundance based management" for the first time and created a sliding scale for

1 Chinook harvest that reduced harvest when stocks were less abundant but allowed harvest to
2 increase in years when stocks were more abundant. I stepped down from the Northern Panel in
3 2000, after the new Treaty was signed. Illness had forced my resignation.

4 6. During 2016-2019 I worked as Executive Director for two SEAK fisheries
5 advocacy nonprofit organizations; the Chinook Futures Coalition and the Pacific Salmon Treaty
6 Coalition.

7 7. In 2019 the Alaska Trollers Association nominated me to return to the Pacific
8 Salmon Commission as a Northern Panel Member. I was reappointed on September 11, 2019,
9 and will serve through 2023. I attended the meetings of the Commission last fall and in
10 February. I am familiar with the history of the Pacific Salmon Treaty and regularly review the
11 PSC annual reports on catch and escapement, stock composition, and exploitation rates, etc.

12 8. I also currently represent crewmembers on the Northern Southeast Regional
13 Aquaculture Association Board of Directors. I have been the Secretary/Treasurer for over 20
14 years.

15 9. My experience in these various forums has taught me that salmon issues are
16 complex, and that relationships of management actions are absolutely vital to understanding
17 fisheries issues. The WFC Complaint's first cause of action that . . . "section 7(a)(2) of the ESA
18 is violated" is very troubling to me because, by its narrow focus on the ESA and NMFS
19 management, it does not take into account the extensive cumulative efforts towards rebuilding
20 and recovery that have been made by the participants in the troll fishery since the Pacific Salmon
21 Treaty was first signed in 1985.

22 10. The 7.5% reduction in southeast Alaska Chinook harvest mandated by the
23 recently signed 2019 Treaty should not be valued as an isolated reallocation of the Chinook
24 resource historically harvested in southeast Alaska that will yield inadequate benefits to ensure
25 the fisheries will not jeopardize the continued existence of listed species. On the contrary, under
26 historical State of Alaska management, and then later the terms of the Pacific Salmon Treaty,

1 extremely substantive and qualitative measures have been taken to not only reduce harvests of
2 Puget Sound and Columbia River system threatened species, but reductions were further taken in
3 Alaskan fisheries to gain Canadian cooperation to make even greater additional reductions to
4 Canadian harvests in the West Coast Vancouver Island AABM area in order to benefit threatened
5 species.

6 11. When the Pacific Salmon Treaty was initially signed in 1985, Chinook stocks
7 were returning in low numbers all along the west coast. Alaska had already begun a rebuilding
8 plan (1974) that included limited entry of power and hand troll permits. The State of Alaska
9 restricted the statewide power troll permits to the area east of 144° W longitude, southeast
10 Alaska. The outside coast of southeast Alaska was closed to trolling for Chinook in May and
11 June. All these actions were taken to constrain the troll fishery while Chinook stocks were being
12 rebuilt.

13 12. The 1985 Treaty agreement is a cooperative management plan between the U.S.
14 and Canada to rebuild the Chinook returns coast wide, and to share in the benefits of the
15 resource. How did the Pacific Salmon Commissioners propose to do that? Very simply: by
16 reducing the harvests of Chinook occurring in the major mixed stock fishing areas and managing
17 the other harvest areas to allow the optimum number of salmon to spawn. Later, the descriptors
18 of these areas became the Aggregate Abundance Based Management (AABM) Fisheries and the
19 Individual Stock Based Fisheries (ISBM) discussed in the 2019 SEAK Biological Opinion on
20 page 14. My comments in the following points are meant to be supplemental to that explanation.

21 13. The Alaskan, Canadian and Washington harvest areas are treated differently to
22 achieve the cooperative management goals of the Treaty.

23 14. The harvest responsibilities of each harvest area may be different, but together,
24 when each separate geographic area accomplishes the tasks for which they are responsible; *i.e.*,
25 to manage for escapement and to control harvest, a cooperative and ongoing relationship is
26 established between the U.S., including Alaska and Canada, that was intended to and will benefit

1 Chinook salmon over time and allow Chinook populations to experience optimum levels of
2 return.

3 15. Alaska Harvest Area: All of the southeast Alaska marine saltwater Chinook
4 harvests are managed as a major mixed stock fishing area, or Aggregate Abundance Based
5 Management (AABM) area. The southeast Alaska troll salmon fishing area stretches 485 miles
6 from Dixon Entrance north to Yakutat and then another 135 miles from Yakutat to Cape
7 Suckling. We have a very good understanding about the composition of salmon stocks that flow
8 through SEAK in both state and federal waters each year thanks to the Coded Wire Tag and
9 Assessment programs conducted under the Pacific Salmon Commission. See **Exhibit 1**,
10 APPENDIX E1, for a graphic representation of the Chinook stocks that make up the salmon
11 harvest in SEAK. A good analogy is that Chinook salmon passing through the waters of SEAK
12 are like a freeway full of travelers from different places that have spent years and the great
13 majority of their lives feeding and growing in Alaskan waters and are now eager to return many
14 hundreds of miles --and in some instances over 1000 miles --homeward.

15 16. The total allowable annual Chinook salmon harvest in southeast Alaska is
16 controlled by the limit set by the Pacific Salmon Treaty. The State of Alaska manages all salmon
17 gear types, wherever they are fishing, to remain under that limit. The only exceptions are some
18 very small areas adjacent to hatchery release sites and some small areas adjacent the large rivers
19 that originate in Canada. Those harvests are covered in a different Chapter of the Treaty
20 concerning Transboundary Rivers. The important point: the Chapter 3 Treaty limit applies to all
21 areas and all fisheries in SEAK. (AABM) Alaska has met the responsibility to accurately report
22 the catch and to reduce their harvest rate on Chinook salmon. The savings achieved by the
23 reduction of harvest in Alaska creates a surplus that can be reallocated to fisheries and needed
24 escapement further south in British Columbia (BC) and Washington and Oregon.

25 17. British Columbia Harvest Areas: A different situation exists in British Columbia.
26 Rather than manage all Chinook harvest under a single limit, areas are either catch-limited

1 (AABM) or managed to provide for both harvest and maximum sustained yield spawning
2 escapement. (ISBM)

3 18. Two BC areas are managed to (AABM) Chinook catch limits. One in the
4 Northern BC troll and Queen Charlotte Island sport fisheries, and one on the west coast of
5 Vancouver Island and Outside sport fishery. Canada thus receives a benefit from the reduced
6 SEAK Alaskan harvest passing into their fisheries. However, like Alaska, the Canadian AABM
7 fisheries have been progressively reduced over time. Those reductions have allowed more
8 Chinook to return to Washington and to the Columbia River.

9 19. The AABM catch limits in outside waters of BC fisheries results in greater
10 numbers of Chinook salmon available for harvest and escapement on the inside waters of BC.
11 Areas that are not catch limited are termed ISBM and are managed to achieve both catch and
12 escapement.

13 20. The Washington state fisheries area is managed entirely for escapements and
14 harvest. (ISBM) The job of establishing optimum-yield escapement goals is ongoing and
15 adaptive to ensure those objectives are met, particularly in Puget Sound. Once goals are
16 established, fisheries must be managed to achieve the escapement objectives.

17 21. Table 5 of the BiOp on pages 18 and 19 shows how the new Calendar Year
18 Exploitation rates adopted in the 2019 Treaty will coordinate the management of fisheries to
19 achieve escapement objectives.

20 22. Now that the dynamics of the relationship to rebuild and recover salmon are more
21 clearly understood, the concept of whether or not the reductions taken in the Alaska fishery
22 meaningfully, to the maximum extent practicable, contribute to salmon recovery in Puget Sound
23 and to available prey for SRKW can be evaluated.

24 23. Table 2 on page 14 of the BiOp comes directly from the Chinook Chapter 3 of
25 Annex IV of the Treaty. The Table is a series of formulas to determine the catch limit for
26 SEAK. The formulas are relative to the 2009 agreement and show to what degree catch is being

1 reduced by the new 2018 agreement. The southeast Alaska table also shows how the state
 2 allocates the Chinook catch under the Treaty. According to Table 2, the Southeast Alaska All
 3 Gear catch will be reduced by 7.5% from the 2009 Treaty level during years when Chinook
 4 abundance is less than 180% greater than when the Treaty was signed. Further explanation is
 5 called for.

6 24. When the 1985 Treaty was signed, the countries agreed to establish a baseline or
 7 to reflect the depressed Chinook status at the time. The years 1979-1982 formed the base period
 8 and the goal agreed upon in the original Treaty was and is to increase the abundance of salmon
 9 coast wide relative to that baseline. The base period established an historical harvest level for
 10 each of the three AABM fisheries, all of SEAK and the two areas of Canada. For southeast
 11 Alaska, the average harvest of Chinook during the base period was 332,583 and the base period
 12 abundance was given a value of 1.

13 25. It was agreed in 1985 that the SEAK historical average Chinook catch would be
 14 then reduced in order to create "saved" Chinook to be reallocated to catch and escapements in
 15 BC and Washington and Oregon. For Alaska, this meant the historic average catch of 333,583
 16 would be reduced to 263,000 annually. Over time, the ceiling harvest was problematic; too high
 17 in years of low abundance and too low when the returns were stronger. A characteristic of
 18 Chinook salmon abundances coast wide is that they rise and fall in cycles that are related to
 19 ocean conditions. **Exhibit 2, APPENDIX G**

20 26. I was a member of the Northern Panel of the Pacific Salmon Commission during
 21 the years 1995-1999 when there was strong disagreement about how the Treaty principles were
 22 being implemented. An abundance-based approach was adopted by the U.S. The major mixed
 23 stock fisheries impacts would be managed on the aggregate abundance and the harvest rate
 24 would be reduced relative to the base period to provide savings to catch and escapement. In
 25 1999, Canada agreed to the sliding scale, adjusting it downward in SEAK and northern British
 26 Columbia from the original level.

27. In order to illustrate the cumulative harvest reductions in SEAK Chinook, prior to the adoption of an additional 7.5% reduction in the 2019 Treaty, **Exhibit 3**, "Actual and Foregone Harvest: Southeast Alaska All-gear Treaty Chinook" has been developed, based on the available published data from the Pacific Salmon Commission reports for the years 1985 to 2018. The table illustrates how many Chinook have been saved by the reductions taken in the SEAK fishery since 1985. The assumption is made that if the SEAK harvests had continued to operate without the salmon Treaty reductions in place the average catch would rise and fall relative to abundance, all other factors being equal.

28. Exhibit 3 shows that the Treaty reductions in the SEAK fisheries have yielded an average savings of 215,000 Chinook salmon annually to be reallocated to harvest and escapements in BC and Washington and Oregon. The average actual harvest in SEAK has been held to 268,000 Chinook, much lower than the unrestrained average catch of 483,000. The SEAK harvests have been reduced by 45% over the life of the Treaty. In the 34 years since the Treaty was signed, the reductions in the Alaska management area (AABM) have saved over 7,310,000 Chinook salmon and passed them to fisheries and escapement in Canada, Washington and Oregon.

29. Although there are generalities in the construction of Exhibit 3, it illustrates the measurable and significant contributions that have been made by southeast Alaska trollers (and other Alaska fisheries) to assist in the rebuilding and recovery of Chinook salmon, even prior to the additional 7.5% reduction required under the 2019 Treaty.

30. The Northern Southeast Regional Aquaculture Association in Sitka commissioned the McDowell Group of Juneau to do an economic analysis of the impacts of the 7.5% reduction on the troll fishery. **Exhibit 4**, page 24, is a graphic representation of the progressively reduced harvest rates allowed the SEAK fisheries under the 2019 Treaty and all prior negotiations. Please note that at baseline abundance levels (an abundance denoted as "1"), when the fisheries formerly harvested 332,583, the allowable harvest in SEAK will be reduced by 64.6%. The

1 sliding scale increases the reductions in the fisheries and makes the greatest reductions in the
2 years of lowest abundance. All of these reductions in the SEAK harvest of Chinook salmon
3 were made in order to pass Chinook stocks to other distressed areas in Canada and the Pacific
4 Northwest.

5 31. **Exhibit 5**, page 23, also from the McDowell Group report, states, "Based on ex-
6 vessel prices over the 2009-2018 period, the 10-year total value (or cost) in 2018 dollars of those
7 reductions ranges between \$8.7 million and \$15.4 million, again depending on the basis of
8 comparison."

9 32. All U.S. and Canadian management agencies made a commitment to develop and
10 manage Chinook salmon escapements to provide optimum production by establishing Maximum
11 Sustained Yield escapement goals, or another escapement goal approved by the Chinook
12 Technical Committee. Alaska has developed a set of Chinook Escapement indicator stocks with
13 Maximum Sustained Yield escapement goals approved by the Chinook Technical Committee of
14 the Pacific Salmon Commission. Alaska actively manages, through a management plan
15 developed in the State Board of Fisheries process, to achieve those escapements. However, it is
16 important to note that the escapement goals for Puget Sound are still very deficient.

17 33. "Escapement trends for 1999-2018 revealed several noteworthy patterns for Puget
18 Sound and Washington Coastal escapement indicator stocks (Figure 2.5). Of the seven Puget
19 Sound indicator stocks, rates of change in escapement declined significantly for Stillaguamish
20 (-4.1%) and increased significantly for Skagit Spring (5.2%) and Lake Washington (2.5%).
21 Confidence intervals around the rates of change, as well as point estimates, for the remaining
22 four Puget Sound indicator stocks indicate no significant trends. However, due to widely
23 varying escapements, there is considerable uncertainty around rate of change estimates for the
24 Skagit River summer/fall stock and the Snohomish River, Green River, and Nooksack spring
25 stocks. Although Puget Sound indicator stocks have largely met their agency management
26 objectives (*i.e.*, exploitation rate ceilings) for the period 1999-2018, none of them have Chinook

1 Technical Committee (CTC)-approved escapement goals against which trends can be evaluated.
 2 Pacific Salmon Joint Technical Committee Report, Annual report of catch and escapement for
 3 2018. Report TCCHINOOK (19)-01. pg. 30.

4 34. It is not the Alaska troll fishery that is responsible for the decline of the Puget
 5 Sound salmon stocks. If the Treaty obligations to establish CTC-approved escapement goals for
 6 Puget Sound had been put into place, even by 1995, 24 complete life cycles of Puget Sound
 7 Chinook salmon would have benefitted by management for optimum production and prey
 8 availability to SRKW would have increased.

9 35. The reductions that have been taken in the Alaska fisheries have contributed to a
 10 great extent to the success of the rebuilding program in the Columbia River system. Columbia
 11 River stocks, part of the far-north migrating group harvested in the Alaska fisheries, often
 12 account for 30% of the Alaska harvest, as could be seen in Exhibit 1. **Exhibit 6** is a graph of
 13 Columbia River returns. Although the stocks regularly cycle to lower levels, the increased
 14 abundances in years when ocean conditions are favorable have tripled the average size of the
 15 return to the Columbia/Snake Rivers. The Snake River fall Chinook are one of the threatened
 16 stocks harvested in the SEAK fishery. This is another example of the quantifiable benefits that
 17 the harvest rate reductions in the SEAK troll fishery have achieved.

18 36. Just as the significance of harvest rate reductions to contribute to salmon recovery
 19 are more accurately evaluated when viewed in context of total harvest rate reductions over the
 20 life of the Treaty, so, too, should the extent of harm that a closure to the SEAK summer troll
 21 fishery in the EEZ be evaluated.

22 37. Alaska is managing their Chinook fisheries to meet Treaty obligations of
 23 maximum sustained yield escapements. Warm ocean conditions off Alaska and British
 24 Columbia in recent years (the "Blob") negatively affected marine survival rates for Chinook
 25 salmon, and currently, several Alaska rivers are not meeting escapement goals. The SEAK troll
 26 fisheries have been severely curtailed since 2017 in order to increase escapements to Alaska

1 rivers and meet Treaty obligations.

2 38. On October 24, 2018, acting in my capacity as Executive Director of the Chinook
3 Futures Coalition I wrote to the Office of the Governor of Alaska to apply for a Federal Fisheries
4 Disaster Determination for the Southeast Alaska Troll Fishery due to the severity of the losses
5 made to contribute to escapements. Excerpts from that letter are attached as **Exhibit 7**.

6 39. "2017-The sudden and unexpected failure in Chinook salmon returns necessary to
7 meet 2017 escapement goals in Chinook index systems monitored by the Alaska Department of
8 Fish and Game precipitated a series of disruptive region-wide closures that did, and will, result in
9 a significant loss of access to the Chinook fishery resource for a substantial period of time.
10 Calendar year 2017 total Chinook harvest was 49% less than the previous five-year average,
11 according to preliminary estimates made from ADF&G data (attached)."

12 40. "The preliminary conservative estimate from the ADF&G (attached) shows the
13 loss of the August fishery decreased the value of the Summer Troll fishery by 67%, or
14 \$2,583,695."

15 41. "The six-week closure of the Winter Troll Chinook fishery from March 15th to
16 April 30th 2018 had a devastating impact on individual fishermen and processors. Year round
17 employees were laid off, markets disrupted and other impacts occurred. Preliminary
18 conservative estimates from ADFG show the 2018 Winter Chinook harvest was 74% lower than
19 the previous five year average and total value of the catch from conservative data provided by
20 ADF&G was reduced by 65% compared to the previous five years."

21 42. "The Spring Troll Chinook fisheries were largely eliminated during 2018 on
22 inside waters, disproportionately affecting those inside communities. Opportunity to harvest
23 Spring Chinook returns was greatly reduced on the outside waters. The total harvest of Chinook
24 in the Spring Troll fishery was 80% below the recent five-year average and 2017 value was 65%
25 lower than the previous five-year average".

26 43. Alaska trollers are going through a difficult period adapting to restrictions in their

1 fisheries, and closure of trolling in the EEZ will only add to disruption and destabilization of the
2 fishery.

3 44. The Complaint filed by the Wild Fish Conservancy in this case also seeks to close
4 salmon fishing in the EEZ. "Salmon fishing" could be construed to mean all salmon fishing and
5 that would mean the trollers would lose access to Coho, Pink and Chum salmon stocks that are
6 taken in the Summer troll fishery. **Exhibit 8** shows that the volume of Coho compared to
7 Chinook in the summer troll fishery is usually two to five times greater than the number of
8 Chinook. These non-Chinook salmon are all SEAK or northern BC fish that do not migrate to
9 SRKW traditional feeding grounds

10 45. The Complaint refers to "funding for increases in hatchery production and habitat
11 restoration - that is entirely speculative, undefined." Because of my role as a Panel member of
12 the Pacific Salmon Commission, I can attest that there was a well-defined lobbying effort in
13 Congress to obtain funds that was in fact successful. The federal FY 20 appropriations budget
14 has been finalized and allocated over \$20 million to NOAA NMFS in support of the 2019 Treaty
15 agreement and NMFS appropriated over \$17 million of the funding for hatchery and habitat
16 programs to benefit SRKW. These funds have now been transferred to NMFS.

17 46. If the injunction to close the SEAK summer troll fishery in the EEZ is upheld,
18 such a closure will undermine and destabilize a fishery already struggling with restricted seasons
19 to achieve Chinook salmon escapement goals. It will eliminate access to Coho salmon worth
20 millions of dollars. It will cause conflict with charter vessels and the recreational fishery by
21 pulling the troll fishery in, to fish right on top of areas adjacent to the towns where recreational
22 fishermen and women are fishing in their smaller vessels. It will create enforcement problems
23 patrolling an ill-defined boundary existing at any point three miles from shore.

24 47. Cooperative management by reasonable people toward a common goal of
25 sustaining salmon and assisting the Orcas is already well established.

26 48. Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is

1 true and correct to the best of my knowledge.

2 Executed on May 9th 2020, at Sitka, Alaska.


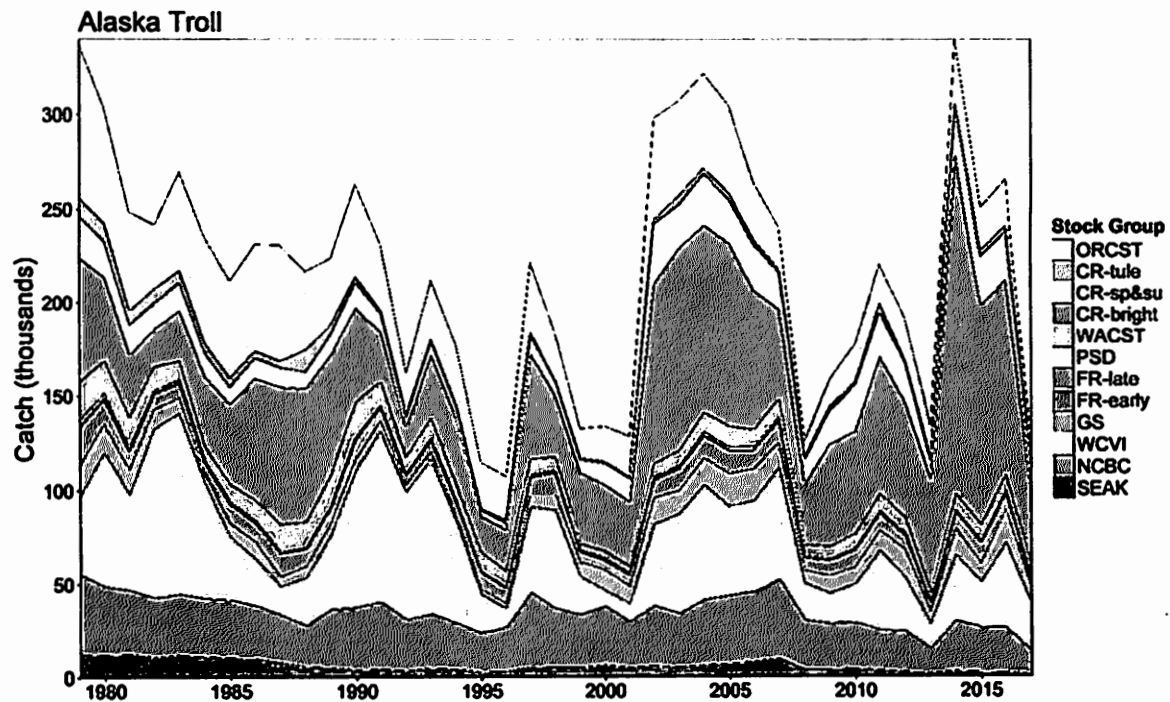
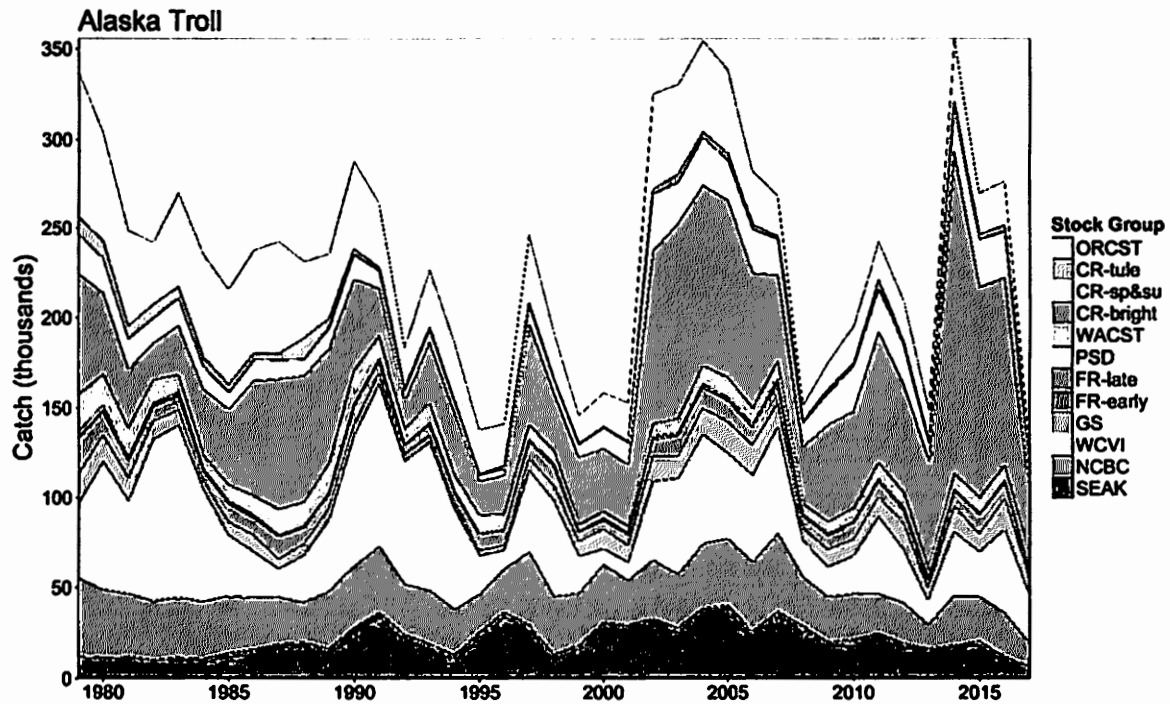
3
4 
5 DEBORAH LYONS

Exhibit 1

Appendix E1—Chinook Model Estimates of landed catch stock composition for Alaska troll with (upper) and without (lower) Alaska hatchery add-on and terminal exclusion, 1979–2017.



APPENDIX G: TIME SERIES OF AABM FISHERY ABUNDANCE INDICES

Appendix G. Time series of abundance indices from 1979 to 2019 for SEAK, NBC, and WCVI AABM fisheries as estimated by CTC Chinook Model calibrations CLB1804.

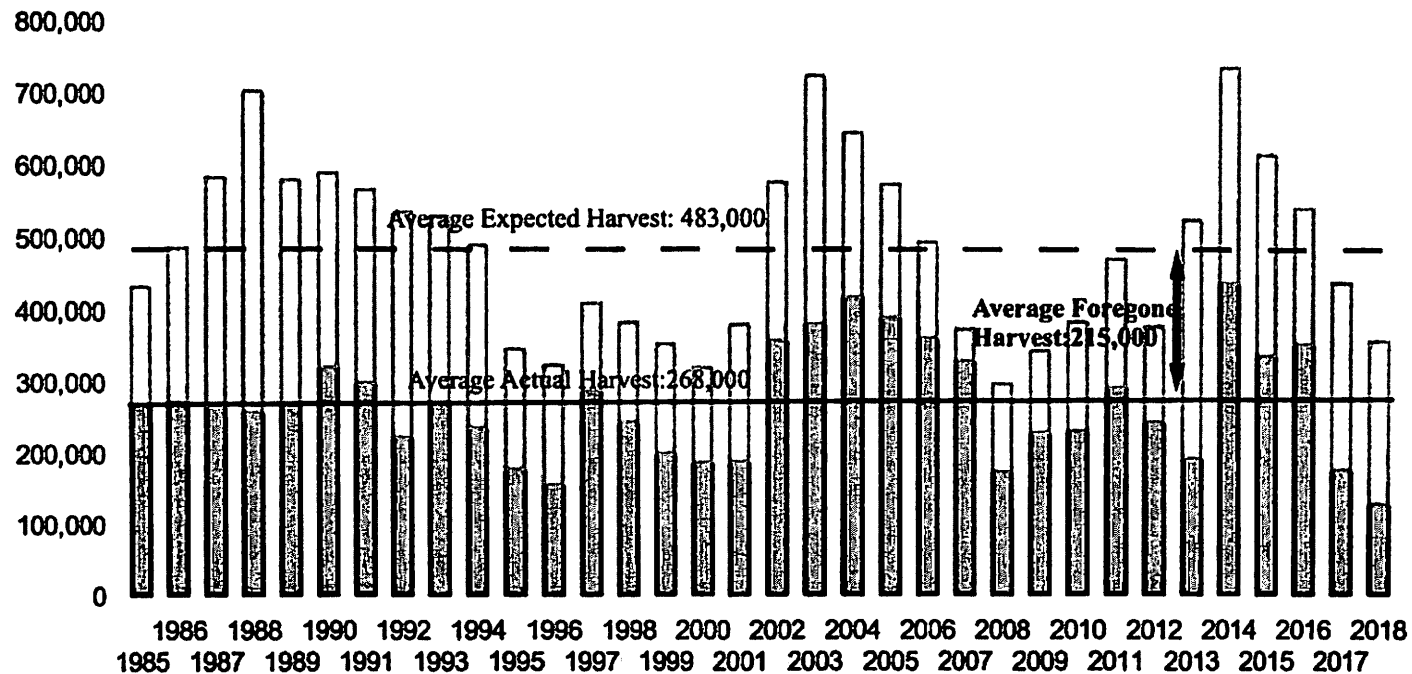
Year	Alaska T	North T	WCVI T
1979	0.95	1.04	1.10
1980	1.04	1.00	0.97
1981	0.95	0.96	0.93
1982	1.06	1.00	1.00
1983	1.23	1.20	0.93
1984	1.46	1.35	0.99
1985	1.30	1.26	0.96
1986	1.46	1.43	1.03
1987	1.75	1.74	1.20
1988	2.11	1.82	1.14
1989	1.74	1.60	0.98
1990	1.77	1.57	0.88
1991	1.70	1.46	0.76
1992	1.61	1.36	0.80
1993	1.59	1.35	0.70
1994	1.47	1.19	0.52
1995	1.04	0.96	0.42
1996	0.97	0.96	0.50
1997	1.23	1.10	0.59
1998	1.15	0.97	0.57
1999	1.06	0.93	0.52
2000	0.96	0.92	0.52
2001	1.14	1.20	0.82
2002	1.73	1.69	1.19
2003	2.17	1.85	1.22
2004	1.93	1.69	1.03
2005	1.72	1.47	0.84
2006	1.48	1.22	0.65
2007	1.12	0.91	0.53
2008	0.89	0.82	0.57
2009	1.03	0.97	0.58
2010	1.15	1.13	0.79
2011	1.41	1.23	0.81
2012	1.13	1.11	0.70
2013	1.57	1.52	0.96
2014	2.20	1.82	1.06
2015	1.84	1.58	0.94
2016	1.62	1.39	0.73
2017	1.31	1.14	0.64
2018	1.07	1.01	0.59

Note: With the exception of the AIs for 2018, this time series is NOT the first postseason AI for each year and is for trend analysis only (Figures 3.10–3.12). For evaluation of overage and underage, use the first postseason AI instead (Source: 1804 PABD Model output file).

17

Exhibit 3

Actual and Foregone Harvest: Southeast Alaska All-gear Treaty Chinook



Notes: Expected Harvest is calculated as 1979-1982 Base Period harvest multiplied by the Southeast Alaska Abundance Index as found in Appendix G Pacific Salmon Commission Joint Chinook Technical Committee 2018 *Exploitation Rate Analysis and Model Calibration Vol2*; Appendix Supplement TCChinook (19)-02 V.2. Actual Harvest is Treaty catch from Table A1 Pacific Salmon Commission Joint Chinook Technical Committee Annual Report of Catch & Escapement for 2018 TCChinook (19)-01

Appendix

Graphic Depiction of "Broken stick" Relationship between Chinook AI and Catch for the Current PST Agreement Compared to Previous PST Agreements

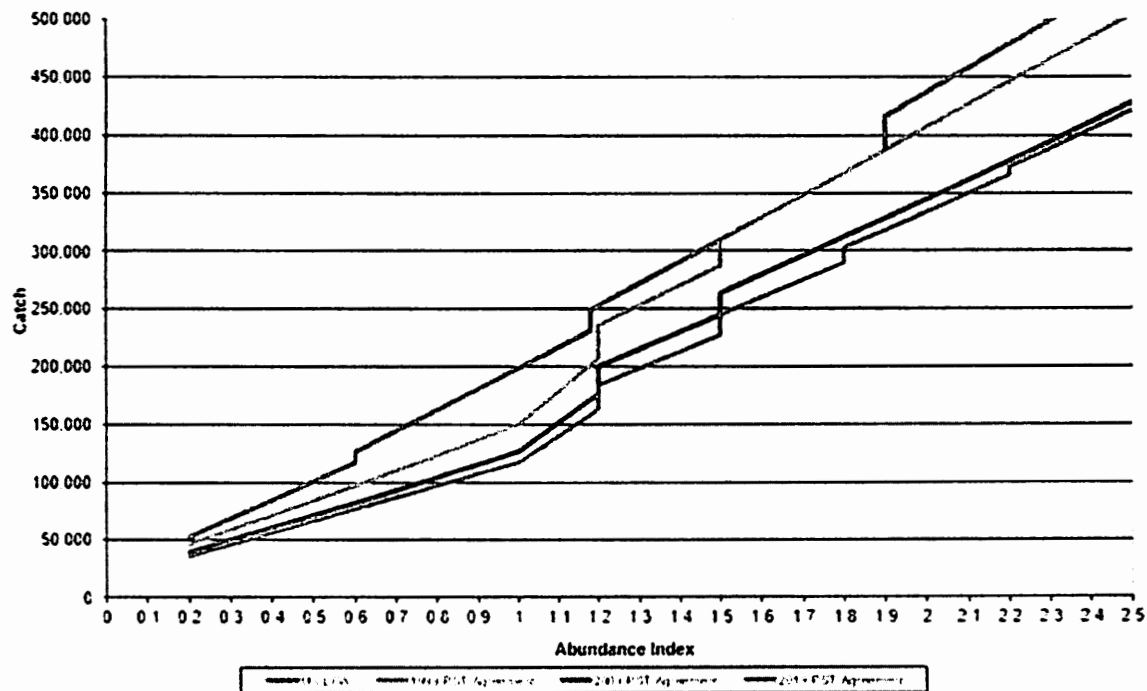


Table 26. SE Alaska All-Gear Chinook Quota Under Current and Previous Pacific Salmon Treaties, at Abundance Index (AI) Levels of 1.0, 1.5, and 2.0

Abundance Index	Quota (No. of Chinook)		
	AI 1.0	AI 1.5	AI 2.0
1979-82 Base Period Harvest	332,583	-	-
Treaty Year			
1999	150,000	287,700	406,700
2009	127,500	244,600	345,700
2019	117,900	226,200	334,500
2019 Reduction from Base Period (%)	-64.6%	-32.0%	+0.6%

Source: Drawn from Pacific Salmon Treaty and ADFG data.

Exhibit 5 Table 24. Comparison of Troll Allocation under 2019 Treaty CPUE-Tiers with Actual Troll Treaty Pre-season Allocation, Including 2% ADFG Buffer

Year	Troll Allocation Under 2019 PST	New Troll Allocation Less 2% Buffer Reduction	Actual Troll Treaty Pre-season Allocation	% Change	Total Difference	Ex-vessel Value of Difference (2018\$)
2009	103,376	101,308	161,637	-36%	-60,329	-\$3,496,996
2010	151,514	148,484	163,864	-8%	-15,380	-\$1,184,305
2011	197,113	193,171	218,060	-10%	-24,890	-\$1,715,500
2012	151,514	148,484	197,272	-23%	-48,788	-\$3,306,745
2013	151,514	148,484	129,862	17%	18,622	\$1,453,214
2014	197,113	193,171	325,411	-39%	-132,241	-\$7,791,797
2015	247,507	242,557	175,149	41%	67,408	\$3,814,183
2016	247,507	242,557	263,197	-6%	-20,640	-\$1,577,876
2017	151,514	148,484	154,881	-2%	-6,397	-\$631,047
2018	103,376	101,308	106,477	-3%	-5,169	-\$544,946
10-year Totals	1,702,048	1,668,007	1,895,810	-	-227,802	-\$14,981,816
2009-2018 Avg.	170,205	166,801	189,581	-12.0%	-22,780	-\$1,498,182

*Based on CPUE tiers. Note: Average % change is weighted. Source: McDowell Group.

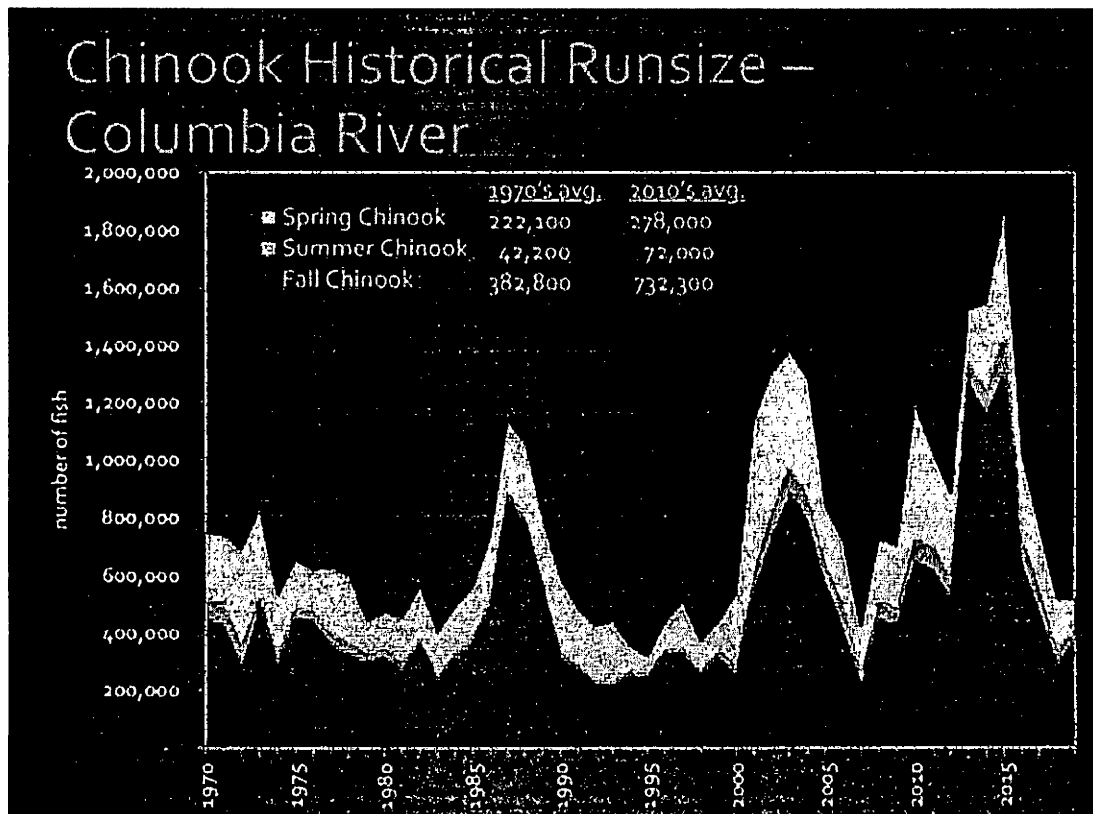
Summary

In summary, if provisions in the 2019 PST had been in place during the 2009 to 2018 period, the number of Chinook available to trollers for harvest (and harvested) would have been between 6.7% and 13.4% lower, depending on the basis of comparison (pre-season allocation, post-season limit, or actual harvest). Based on ex-vessel prices over the 2009-2018 period, the 10-year total value (or cost) in 2018 dollars of those reductions ranges between \$8.7 million and \$15.4 million, again depending on the basis of comparison.

Table 25. Summary of Impacts of the 2019 PST Provisions on the Troll Fleet, Based on 2009-2018 Quotas, Abundance Indexes, and Harvests

	Measure
Actual 2009 - 2018 Total Troll Treaty Harvest (no. of fish)	1,965,859
Actual 2009 - 2018 Total Troll Treaty Pre-season Allocation (Based on Pre-season AI)	1,895,810
Actual 2009 - 2018 Total Troll Treaty Catch Limit (Based on Post-season AI)	1,851,119
If 2019 PST Troll allocation formula had been in place in 2009 - 2018	
Total Pre-season Limit Under New CPUE Tier	1,702,048
% Change from Actual Pre-season Allocation	10.2%
Total Ex-vessel Value of Change (2018\$)	-\$12.5 million
% Change from Actual Harvest	13.4%
Total Ex-vessel Value of Change (2018\$)	-\$15.4 million
Total Limit Under New Post-season AI Tier	1,726,496
% Change from Actual Post-season Limit	6.7%
Total Ex-vessel Value of Change (2018\$)	-\$8.7 million
% Change from Actual Harvest	12.2%
Total Ex-vessel Value of Change (2018\$)	-\$14.9 million

Not quantified in Table 25 is any measure of the value of unfilled quota that could not have been carried forward to the next season.



- 1. If the lower bound of the biological escapement goal range is met or exceeded in 3 consecutive years or is met in 4 out of 6 consecutive years, the department will recommend removing Unuk River king salmon as a stock of management concern at the first Southeast and Yakutat board meeting after this condition is met.*
- 2. Management measures could be relaxed in specific areas if updated stock composition and harvest data indicates areas where restrictions are no longer needed to ensure the escapement goal is met.*
- 3. In the event that two consecutive years of escapements are near the upper bound of the Escapement goal range or above the range, some management restrictions may be relaxed or set aside using EO authority.*

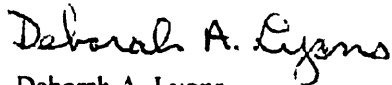
REGIONAL INFORMATION REPORT NO. 1J18-04

UNUK RIVER KING SALMON STOCK STATUS AND ACTION PLAN, 2018

By Judy L. Lum Alaska Department of Fish and Game, Division of Sport Fish, Douglas, and
Lowell Fair Alaska Department of Fish and Game, Division of Commercial Fisheries, Douglas

On behalf of the CFC Board of Directors and our affiliated organizations we thank Governor Walker for initiating this request. We are grateful that NOAA and NMFS policies accommodate opportunities to apply for assistance in exceptional circumstances. Please do not hesitate to contact us for further information.

Sincerely,



Deborah A. Lyons
Executive Director, Chinook Futures Coalition

Attachments:

ADFG Preliminary data 2017 and 2018
SEAK Chinook Abundance Indices 1979 – 2018

Spring Troll Fishery 2008-2018

Batch Year	Unique Permits	Landings	Harvest	Avg Price	Avg Wt	Value
2008	573	3,422	36,638	6.61	15.35	\$3,715,207
2009	550	3,001	32,581	4.10	14.37	\$1,917,312
2010	544	2,862	28,617	4.86	14.42	\$2,006,266
2011	582	3,069	38,936	4.77	13.95	\$2,590,313
2012	544	2,652	24,771	5.88	12.79	\$1,861,634
2013	578	2,885	37,308	5.88	12.80	\$2,808,112
2014	562	2,962	42,548	5.45	12.64	\$2,929,062
2015	592	3,615	53,692	5.23	12.70	\$3,569,336
2016	574	4,126	42,502	8.09	11.78	\$4,050,875
2017	417	1,664	17,606	9.08	11.84	\$1,891,957
2018	270	1,103	7,701	11.35	12.68	\$1,108,951

2018 vs 2017 17,606 -56% \$1,891,957 -41%
 2018 vs 5-yr avg 38,791 -80% \$3,049,868 -64%

Winter Troll Fishery 2008-2018

Batch Year	Unique Permits	Landings	Harvest	Avg Price	Avg Wt	Value
2008	468	3,379	21,824	8.62	14.48	\$2,722,954
2009	430	2,827	24,889	6.75	13.82	\$2,322,971
2010	459	3,827	42,536	7.17	13.16	\$4,010,531
2011	464	3,878	50,826	6.97	12.54	\$4,442,190
2012	507	4,057	47,900	7.03	11.91	\$4,012,861
2013	442	3,411	26,612	8.67	12.58	\$2,901,956
2014	464	3,923	56,538	7.43	11.45	\$4,807,994
2015	407	3,605	50,673	8.68	11.54	\$5,077,209
2016	429	3,957	52,291	8.02	10.24	\$4,293,379
2017	434	3,736	43,889	9.83	10.75	\$4,641,477
2018	328	1,887	11,967	11.31	11.31	\$1,530,741

2018 vs 2017 43,889 -73% \$4,641,477 -67%
 2018 vs 5-yr avg 46,001 -74% \$4,344,403 -65%

Summer Troll Fishery 2008-2018

Batch Year	Unique Permits	Landings	Harvest	Avg Price	Avg Wt	Value
2008	870	2,222	88,896	5.59	14.88	\$7,401,732
2009	921	3,228	117,587	2.40	13.54	\$3,819,976
2010	864	2,709	123,167	3.52	14.09	\$6,098,559
2011	874	2,955	150,652	3.70	12.80	\$7,141,825
2012	923	4,905	135,594	3.66	12.90	\$6,405,563
2013	713	1,312	84,650	4.61	12.12	\$4,729,740
2014	887	2,772	255,084	3.54	11.61	\$10,496,144
2015	768	1,790	164,647	2.85	11.41	\$5,350,030
2016	833	3,910	180,952	5.10	11.55	\$10,654,401
2017	700	1,150	64,423	7.33	11.09	\$5,238,976
2018	710	2,772	86,758	8.51	11.91	\$8,791,255

**2017 No August Fishery- resulted in below
summer troll Chinook value**

31,218 \$2,538,695

-67%

2018 vs 2017 64,423 95% \$5,238,976 68%
 2018 vs 5-yr avg 149,951 -42% \$7,293,859 21%

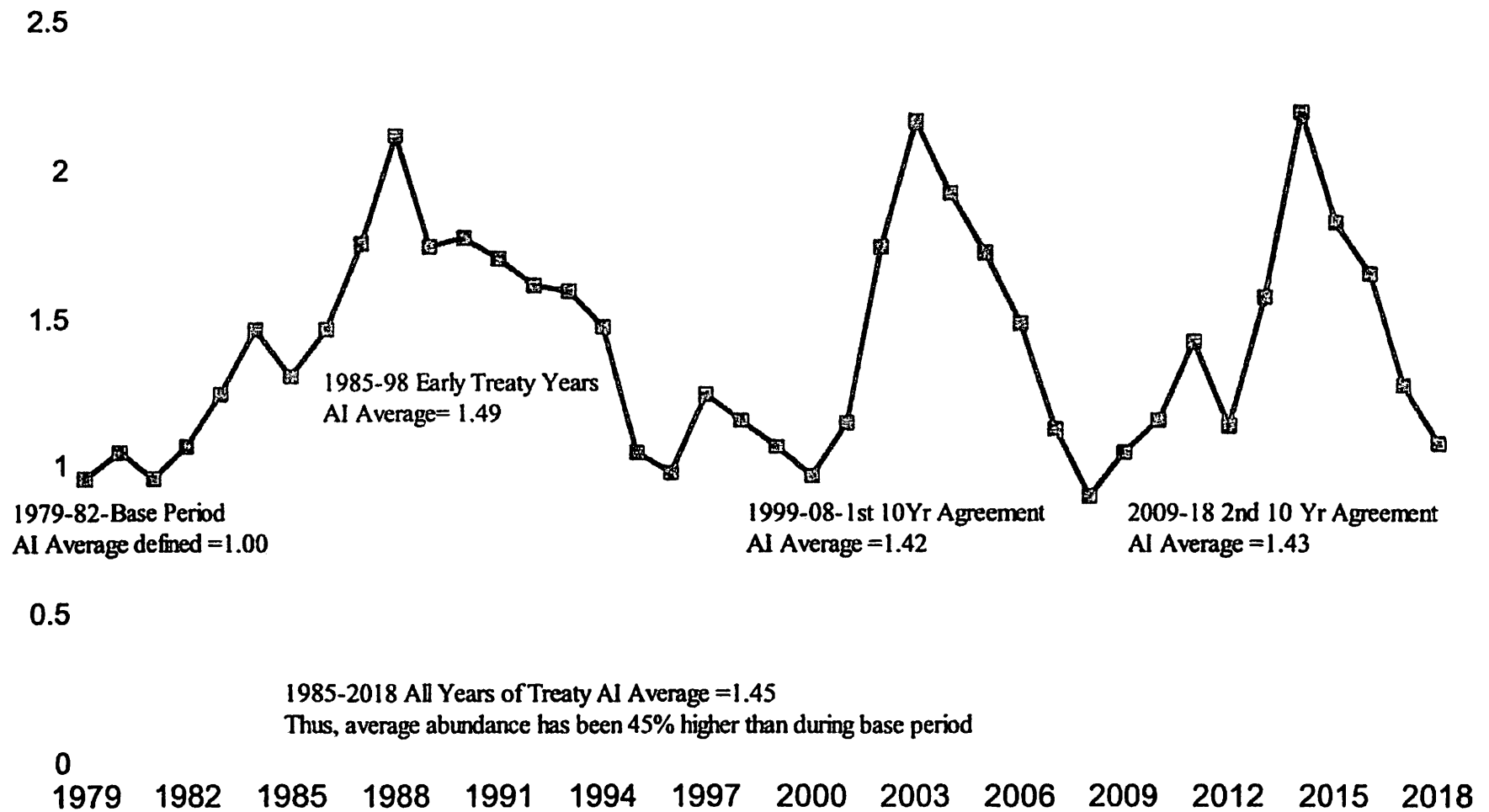
2017 vs 5-yr avg 164,185 -61% \$7,527,176 -30%

Chinook Troll Fishery Calendar Year 2008-2018						
Batch Year	Unique Permits	Landings	Harvest	Avg Price	Avg Wt	Value
2008	1,029	9,209	152,277	6.25	14.9	\$14,194,460
2009	1,034	9,431	178,848	3.41	13.7	\$8,373,823
2010	1,002	9,835	199,772	4.55	13.9	\$12,669,296
2011	1,039	9,946	240,387	4.54	12.9	\$14,069,585
2012	1,036	11,552	206,577	4.63	12.7	\$12,140,115
2013	930	7,966	155,624	5.74	12.3	\$11,023,171
2014	1,033	9,894	365,437	4.54	11.6	\$19,341,410
2015	975	9,643	275,087	4.55	11.6	\$14,518,880
2016	956	11,179	253,278	6.13	11.5	\$17,813,899
2017	849	6,859	127,798	8.63	11.1	\$12,205,625
2018	797	5,011	100,139	8.98	12.0	\$10,745,012
2017 vs 2016			127,798	-50%		\$12,205,625
2017 vs 5-yr avg			251,201	-49%		\$14,967,495

Chinook Troll Fishery 2008-2018						
Batch Year	Unique Permits	Landings	Harvest	Avg Price	Avg Wt	Value
2008	1,031	9,370	151,936	6.26	14.9	\$14,200,212
2009	1,038	9,150	175,644	3.39	13.7	\$8,181,252
2010	1,001	9,553	195,620	4.49	13.9	\$12,243,973
2011	1,039	10,040	242,569	4.55	12.9	\$14,270,698
2012	1,048	11,731	209,074	4.66	12.7	\$12,334,446
2013	919	7,743	149,541	5.69	12.4	\$10,533,997
2014	1,033	9,813	355,570	4.45	11.7	\$18,528,575
2015	978	9,129	269,862	4.54	11.7	\$14,322,278
2016	965	12,076	276,432	6.17	11.3	\$19,341,339
2017	842	6,808	129,596	8.51	11.1	\$12,230,739
2018	837	6,080	107,537	9.11	11.9	\$11,667,775
2018 vs 2017			129,596	-17%		\$12,230,739
2018 vs 5-yr avg			236,200	-54%		\$14,991,386

/ reduction to

SEAK Abundance Index (CLB 1804)



CHINOOK FUTURES COALITION

PO BOX 735 SITKA, AK 99835

DLYONS@CCI.NET 907-738-3362

The Honorable Governor
William M. "Bill Walker"
PO Box 110001
Juneau, AK 99811

Sam Cotton, Commissioner
Alaska Department of Fish and Game
PO Box 115526
Juneau, AK 99811-5526

October 24, 2018

RE: Chinook Futures Coalition support for a petition from the Office of the Governor of Alaska to the Secretary of Commerce concerning a Federal Disaster Determination for the 2017 and 2018 Southeast Alaska Power Troll Chinook salmon fisheries

Dear Governor Walker:

The Chinook Futures Coalition supports a letter from the Office of the Governor of Alaska to the Secretary of Commerce requesting a Federal Disaster Determination for the 2017 and 2018 Southeast Alaska Power Troll Chinook salmon fisheries, according to provisions of the MSA and IFA. The Chinook Futures Coalition is composed of an affiliation of members, all concerned about Chinook salmon management in Southeast Alaska. The region is experiencing a perfect storm of events resulting in unprecedented low numbers of Chinook available for harvest. CFC is a 501 (c)(6) dedicated to promoting the availability of Chinook salmon in Southeast Alaska for harvest by commercial and recreational fisheries. Our purposed is to promote and enhance the economic value of Chinook salmon to consumers, visitors, and local communities and we engage in activities to educate decision makers. Our efforts are directed at the improvement of business conditions.

CFC saw the storm clouds gathering on the horizon in the fall of 2017. We engaged in a number of public relations efforts to raise awareness of possible economic impacts due to the low Chinook returns. In November of 2018 CFC made a presentation to the Southeast Conference annual regional gathering of municipal officials in the State capitol of Juneau. The presentation was titled; "No Fishing...Too many vacancies at the Salmon Hotels", and highlighted the unprecedented failure of SEAK Chinook salmon systems to attain acceptable escapement levels. The presentation was aimed to increase awareness of how conservation restrictions taken under the January Alaska State Board of Fisheries regulations to protect SEAK Chinook escapements could combine with restrictions under the Pacific Salmon Treaty to ratchet the commercial power Troll fishery down to the lowest levels of economic viability ever witnessed.

CFC followed up with December of 2017 and March of 2018 King Salmon Forums in Sitka to address the low Chinook returns and the impending settlement of the Pacific Salmon Treaty. Please see the attached agendas.

CFC supports a request from the Office of the Governor to the Secretary of Commerce that both calendar years, 2017 and 2018, come under consideration for Federal Disaster Assistance. Our organization will support and cooperate with requests from NMFS for more detailed socio economic and statistical data. Initial data from the ADF&G (Attached) indicate that a fishery resource disaster has occurred with respect to Southeast Alaska Chinook salmon production and

I CFC Chinook Salmon Disaster Relief Request to Gov. Walker October 2018

has caused a corresponding loss of value to the fishery. The natural resource disaster of precipitously low marine survivals due to warm ocean conditions has disproportionately affected the SEAK Power Troll fisheries for Chinook. These losses, while moderated somewhat when viewed on a calendar year basis, caused hardship, disruption and severe economic setbacks to the fishermen and communities to whom they occurred, at the times they occurred. Restrictions under the Unuk and Chilkat River Action Plans will likely continue into the future: ie; the six week closure of the Winter Troll fishery and the prohibition on retention of Chinook in SEAK inside waters in the Spring fisheries.

The sudden and unexpected failure in Chinook salmon returns necessary to meet escapement objectives for 2017 were due to natural causes - drastically reduced marine survivals due to an anomalous (the Blob) extended period of warm water commensurate with life history stages critical to salmon development and survival. Further documentation that the SEAK Chinook fisheries resource disaster was due to natural causes is available from the ADF&G.

2017

The sudden and unexpected failure in Chinook salmon returns necessary to meet 2017 escapement goals in Chinook index systems monitored by the Alaska Department of Fish and Game precipitated a series of disruptive region-wide closures that did, and will, result in a significant loss of access to the Chinook fishery resource for a substantial period of time. Calendar year 2017 total Chinook harvest was 49% less than the previous five-year average, according to preliminary estimates made from ADF&G data (attached).

The 2017 Chinook escapement failure was not documented until the late July compilation and analysis of escapement data was published. In reaction, a complete region-wide closure to Chinook retention was put into place from August 7 through September 30, 2017 with serious economic repercussions across all sectors. The ADF&G August 7, 2017 Summer Troll Fishery Announcement stated that the Summer Troll fishery would remain closed to provide "conservation measures ... necessary to reduce harvest." The August portion of the 2017 Summer Troll fishery (31,000 Chinook) was cancelled. The entire SEAK region was prohibited from retaining Chinook salmon through September 30, of 2017.

Because the Commercial Troll fishery is allocated 80% of the Annual All-Gear Chinook Quota, after the net fishery quota is subtracted, commercial fisheries impacts due to the loss of Chinook most significantly affect Power Troll permit holders. Impacts to charter fisheries and other recreational fisheries are not within the scope of this letter.

The preliminary conservative estimate from the ADF&G (attached) shows the loss of the August fishery decreased the value of the Summer Troll fishery by 67%, or \$2,583,695. Processors of Troll Chinook can provide additional estimates of the losses incurred as a result of cancelled orders to long-standing customers, loss of opportunity to market of other species concurrent with Chinook product sales, loss of volume through the plants resulting in higher operating expenses, etc. Therefore, the preemptory ADF&G 2017 closure constituted a serious disruption affecting production. A partial list of regional processors includes: Seafood Producers Cooperative, Sitka Sound Seafoods, E.C Phillips and Son, and Alaska Glacier Seafoods.

The SEAK Commercial Troll fishery operates under three distinct management plans: the Winter Troll fishery – designed to keep fresh product on the market while allowing for winter income,

2 CFC Chinook Salmon Disaster Relief Request to Gov. Walker October 2018

especially important to rural residents and processors. The Spring Troll fishery- designed to optimize harvest of Chinook salmon produced by the S.E. Alaska region wide Chinook enhancement programs and the Summer Troll fishery - designed to harvest mixed stocks of coast wide Chinook salmon.

The very conservative, ADF&G total 2017 calendar year value estimate for Chinook was 18% below the previous five-year average, but the impacts during an extended period time (August) disrupted production and were disproportionately felt among the rural island communities of Southeast Alaska. Clearly, communities like Juneau, Ketchikan, Craig, Sitka and Pelican felt the loss and impacts of the 2017 Chinook closures to varying degrees of loss and should be allowed to make their cases for assistance in order to assess impacts to the region as a whole. According to provisions of the MSA and IFA revenue losses less than 35% will not be eligible for determination of a commercial fishery failure, except where the Secretary determines there are special and unique circumstances that may justify considering and using a lower threshold in making the determination. CFC respectfully requests that NOAA seek additional socio-economic information from all the affected Southeast Alaska communities.

Additional information should also be requested from the State of Alaska Division of Economic Development Revolving Loan Fund concerning the extent of state loans to Power Troll permit holders. The absence of fisheries opportunities, that were formerly available at the time the debt was incurred, will seriously impact this sector of the SEAK economy. The young Trollers of today are significantly burdened with debt and obligated to meet boat and permit financing contracts; alternative employment to make up partial season shutdowns is not readily available in the isolated island communities. Interim disaster assistance should be considered in order to assist a generation of fishermen to remain viable into the future. Tough decisions were made in '17 and '18 to ensure that Chinook salmon remain sustainable and result in future harvestable surpluses. This is likely to occur with the return of more favorable ocean conditions. (See attachment SEAK Abundance index 1979-2018.) It would be constructive to help the industry and State fishery managers to prepare for increased opportunities when Chinook marine survival and abundance improve.

The CFC is supporting the office of the Governor of the State of Alaska, requesting that, "In consultation with the affected State jurisdiction and/or fishing community, the Assistant Administrator of the National Marine Fisheries Service conduct a review of the available socio-cultural and economic information to determine the existence of a commercial fishery failure, a serious disruption affecting future production, or harm incurred. Such analysis may include information provided by fishery stock assessments, landings data, and revenues. Indicators appropriate to an affected fishery should be developed on a case-by-case basis, and may be the same as or similar to those described in the scientific review. Some characteristics of available information, which may be considered in a review, may include:

- Fishery characteristics (size and value; number of participants; environmental, economic and sociocultural behaviors; whether jobs are full- or part-time; and landings data).
- Percent decline in landings, economic impact, revenues, or net revenues by vessel category, port, etc. This should represent the proportion of the affected fishery resource compared to the commercial fishery as a whole (not just for the affected fishery resource).
- Number of participants involved by vessel category, port, etc.
- Length of time the resource (or access to it) will be restricted.
- Documented decline in the resource."

2018

The six-week closure of the Winter Troll Chinook fishery from March 15th to April 30th 2018 had a devastating impact on individual fishermen and processors. Year round employees were laid off, markets disrupted and other impacts occurred. Preliminary conservative estimates from ADFG show the 2018 Winter Chinook harvest was 74% lower than the previous five year average and total value of the catch from conservative data provided by ADF&G was reduced by 65% compared to the previous five years.

The Spring Troll Chinook fisheries were largely eliminated during 2018 on inside waters, disproportionately affecting those inside communities. Opportunity to harvest Spring Chinook returns was greatly reduced on the outside waters. The total harvest of Chinook in the Spring Troll fishery was 80% below the recent five-year average and 2017 value was 65% lower than the previous five-year average.

The 2018 preliminary conservative ADFG estimates estimate of calendar year value for Chinook was 22% below the previous five-year average. CFC respectfully requests that NOAA seek additional socio-economic information from all the affected Southeast Alaska individual permit holders, processors and communities as to the impacts of the 2018 Winter and Spring Fishery Troll closures to aid his determination whether there are special and unique circumstances that may justify considering and using a lower threshold in making the determination.

From the perspective of the Regional Aquaculture Associations these Winter and Spring Troll management closures are especially problematic in that these are the times of the year that fisheries designed to increase the harvest Chinook produced by Alaska hatcheries occur. The regional hatchery Associations are required in Alaska State Statute to attempt to provide 70% of annual hatchery production to the common property fisheries. The Associations are further directed by State of Alaska Board of Fisheries (BoF) to provide opportunities for gear types to harvest salmon that will maintain relative values between the gear types according to the BoF Southeast Salmon Enhancement Allocation Policy. The CFC is sensitive to actions in fisheries that limit opportunities to harvest Chinook; given the fact the Troll fishery is far below the allocation target range for value (17% actual vs. 27% goal). This letter is offered in support of actions that may mitigate losses to the Chinook Troll fishery and is in support of actions that will assist individual fishermen, processors and Association programs in weathering a period of decreased marine survivals, coupled with decreases in Chinook harvest time and area.

Complete closures to Chinook harvest of time and area, can mean no coded wire tags or genetic data are collected. This creates data gaps in the historical record for stock composition. Alaska hatchery percentages, run reconstruction and marine survival estimates may be lost. CFC is not aware of a supplementary data collection program that will be in place for the next three years. The three-year time frame is a reasonable estimate for the extended period of time that restrictions will be in place, given that the Alaska State Board of Fisheries restrictions on the Winter and Spring Troll Chinook fisheries will remain until distinct multiple year successful attainment of escapement goals are realized in regards to 'stocks of concern'; therefore a serious disruption affecting future production is occurring.

Criteria for removing the (State of AK BoF) stock of concern designation or reducing management restrictions are included here for reference:

Exhibit 8

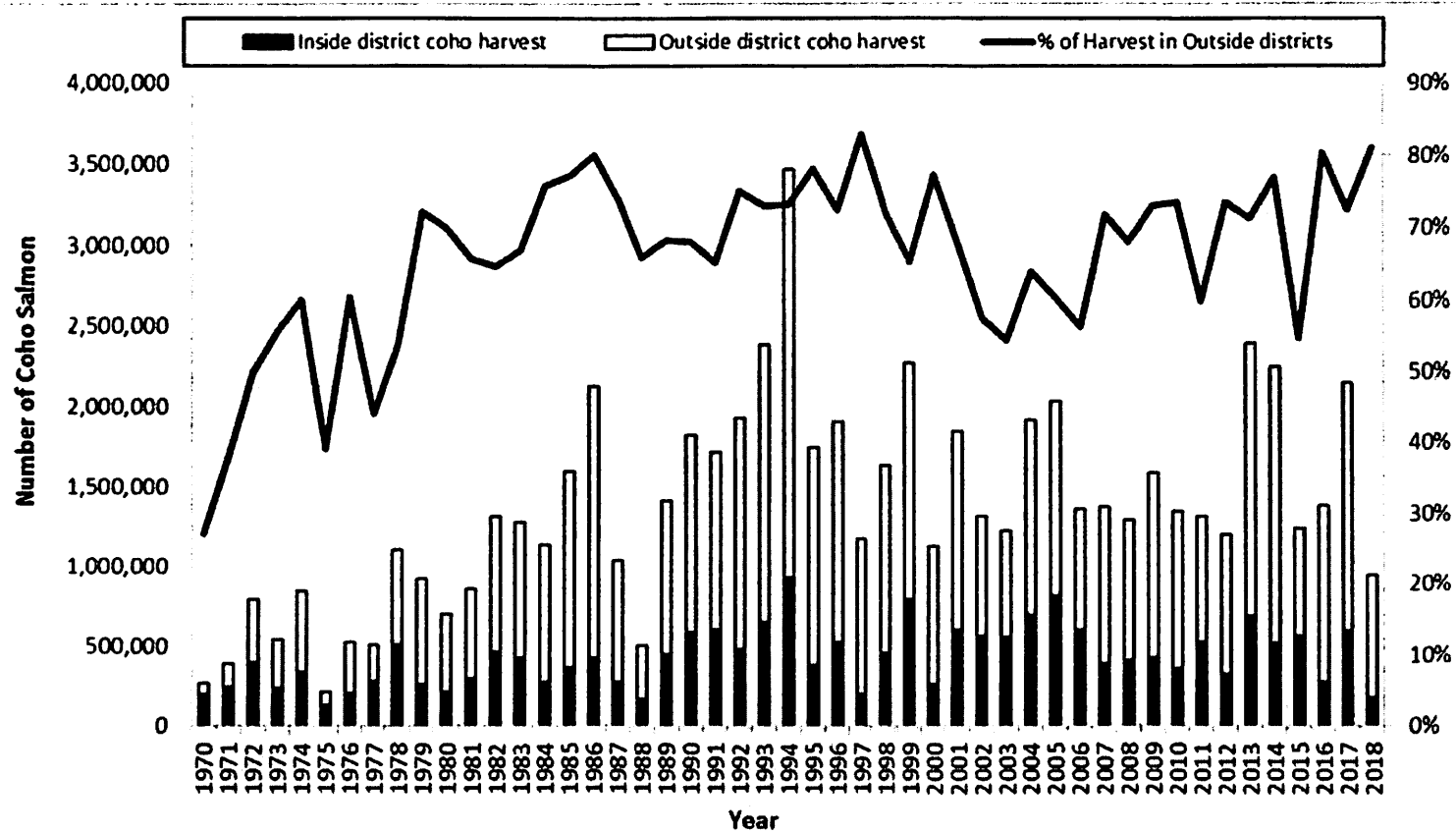


Figure 4.—Southeast Alaska troll coho salmon harvest in the outside (Gulf of Alaska) districts, the inside districts and the percentage of the harvest taken in the outside districts, 1970–2018.

Note: Outside districts are 103, 104, 113, 116, 152, 154, 156, 157, 181, 183, 189, 191; inside districts are 101, 102, 105, 106, 107, 108, 109, 110, 111, 112, 114, 115.

CERTIFICATE OF SERVICE

I hereby certify that on May 11, 2020, I served the foregoing **DECLARATION OF DEBORAH LYONS IN SUPPORT OF DEFENDANT-INTERVENOR ALASKA TROLLERS ASSOCIATION'S BRIEF IN OPPOSITION TO PLAINTIFF'S MOTION FOR PRELIMINARY INJUNCTION** on the following individual(s):

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- ☒ by the Court's CM/ECF system to the email addresses listed above
☐ by facsimile pursuant to the fax numbers listed above
☐ by email to the email addresses listed above
☐ by overnight delivery to the addresses listed above
☐ by first class mail to the addresses listed above.

s/ Kathy Baker

Kathy Baker, Legal Assistant to Thane W. Tienson
Of Attorneys for Intervenor-Defendant Alaska
Trollers Association